

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

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§  
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§

**v.**

**Criminal No. 4:21-cr-  
00009**

**ROBERT T. BROCKMAN**

**[PROPOSED] PROTECTIVE ORDER**

The government's Unopposed Motion for a Protective Order is **GRANTED. IT IS**

**HEREBY ORDERED** that:

1. Within 48 hours, the Defendant shall produce to the government a forensic image of each of the Data Hard Drive and the Operating System Hard Drive (as defined in the Unopposed Motion for a Protective Order, and together the "Hard Drives"). The image(s) shall be identical to those reviewed by the Defendant's forensic expert, Scott Polus, with the same "hash function" value, for the purpose of producing his expert report for the Defendant.

2. The Hard Drives may only be inspected by Special Agent Peter Dickerman of the Internal Revenue Service, Criminal Investigation Division, and only for the purpose of authenticating the 15 Health Documents (as defined in the Unopposed Motion for Protective Order). Among other metadata, Special Agent Dickerman may inspect embedded file metadata for documents created or modified contemporaneously to the 15 Health Documents and any system metadata necessary to authenticate the Health Documents.

3. Within 24 hours after the Court makes a final determination as to the Defendant's competency, the Government shall return the Hard Drives to the Defendant and destroy all copies of any data originating from the Hard Drives.

So ORDERED, this \_\_\_\_ day of September, 2021.

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George C. Hanks  
United States District Judge